

Exhibit 2



Fighting Hate
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Southern Poverty Law Center
PO Box 57089
New Orleans, LA 70157
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Sent via Email

November 13, 2020

Jonathan T. Edwards
Alston & Bird
One Atlantic Center
1201 W. Peachtree St., Suite 4900
Atlanta, Georgia 30309
jonathan.edwards@alston.com

Re: *Barrientos v. CoreCivic, Inc.*, 4:18-cv-00070-CDL (M.D. Ga.) Document Subpoena to Trinity Services Group, Inc., Third Meet and Confer Follow-up

Dear Jonathan,

Thank you for speaking with us on Friday, November 13, 2020, regarding Trinity Services Group, Inc.'s ("Trinity") responses and objections to Plaintiffs' Document Subpoena. This letter is intended to summarize our discussion.

With respect to Plaintiffs' Request 2, you and in-house counsel for Trinity, Alex Chosid, agreed to provide us with the following information by early next week:

- The total number of emails sent and received in the past 7 years in the Trinity email inbox dedicated to Stewart Detention Center ("SDC");
- Of those emails, the total number that are sent to or received from a CoreCivic email address; and
- The emails responsive to the first seven search strings on Plaintiffs' Proposed ESI Search Terms sent to you on October 26, 2020, as well as the search string beginning with "pay" (rows 1-7 and 11).¹

You also confirmed you are currently processing the documents you previously agreed to provide in response to Requests 1, 3, and 5, as well as the Trinity and CoreCivic contract, and will be providing those to us early next week.

Additionally, you agreed to inquire into the Rule 30(b)(6) deposition of Trinity in the *Owino, et al. v. CoreCivic, Inc.* litigation and whether you can provide us with the transcript of that deposition. We stated that the transcript could help us narrow and clarify our search terms and our anticipated Rule 30(b)(6) deposition notice to Trinity.

You declined to run the remaining search strings that Plaintiffs proposed, relating to discipline, grievances, and food (rows 8-10 and 12-13), on relevance and burden grounds. With respect to Request 6, you stood by your objection to providing internal communications about the contract. As a result, you declined to run the search strings that Plaintiffs proposed related to Trinity's internal communications

¹ Attached to this Letter is a revised version of the proposed ESI search terms document that reflects a correction in the search string related to Plaintiff Gonzalo Bermudez Gutiérrez (row 6).

about that contract. You also maintained your objection to Request 4, which asks for identity and payroll information of Trinity staff at SDC. We reiterated the relevance of that information to our claims. We agreed to request court intervention on those issues within the next two weeks.

Finally, you reiterated your request to be compensated for \$20,000 in costs for complying with the subpoena. We stated we cannot negotiate costs with you without an accounting of what work is included in that number. You agreed to provide us with that information.

Please let us know if I have misstated any portion of our conversation. We appreciate your continued attention to this matter.

Kind regards,



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CC:

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Enclosure:

Plaintiffs' Proposed ESI Search Terms (Revised)

Plaintiffs' Proposed Search Terms
Document Subpoena to Trinity Services Group, Inc.

Custodian: trinityservicesgroup.com email box at Stewart Detention Center

Search Prefix	Search String
	201-906-061 OR 201906061
	208-167-091 OR 208167091
	208-280-127 OR 208280127
	wilhen w/2 (hill or barrientos)
	keysler w/2 (urbina or rojas)
	gonzalo w/2 (bermudez or gutierrez)
	("Work Program" OR VWP) AND (money OR pay* OR paid OR salary)
	disciplin* OR sanction* OR punish*
	job* OR labor* OR detail* OR assign* OR clean* OR supervis* OR shift*
	seg* OR solitary OR SHU OR "secure housing" OR "restrictive housing" OR RH*
	pay* OR paid
	weight
	water
	kitchen OR breakfast OR lunch OR din* OR food OR "food service" OR chow*
	clean* OR sanit*
	detainee OR inmate OR resident OR ICE
	stor*
	(strik* OR stoppage OR fire* or terminat* OR refus* OR forc* OR quit*) AND work*
	meal* OR nutri* OR menu* OR diet* OR calori*
	griev* OR kite* OR kyte* OR complain* OR violen*
	contract* OR negotiat* OR pric* OR guidelin* OR nutri* OR standard* OR PBNDS OR "Performance Based National Detention Standards"

Custodians: Trinity employees involved in negotiation or renewal of contract with CoreCivic at Stewart Detention Center

Search Prefix	Search String ¹
(Stewart OR SDC) AND	contract* OR negotiat* OR pric* OR guidelin* OR nutri*OR standard* OR PBNDS OR "Performance Based National Detention Standards"

¹ An additional set of parentheses should be included around search strings intended to be run with a prefix.